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Attorneys for Defendants  
COINBASE GLOBAL, INC. and COINBASE, INC.

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

LARRY PEARL, individually and on behalf of  
all others similarly situated,

Plaintiffs,

vs.

COINBASE GLOBAL, INC. and  
COINBASE, INC.,

Defendants.

Case No. 3:22-cv-03561-MMC

**DECLARATION OF MEREDITH R.  
DEARBORN IN SUPPORT OF  
DEFENDANTS COINBASE GLOBAL,  
INC.'S AND COINBASE, INC.'S  
MOTION TO STAY DISCOVERY  
PENDING RESOLUTION OF  
DEFENDANTS' MOTION TO  
DISMISS AND MOTION TO STRIKE  
CLASS ALLEGATIONS**

Date: July 12, 2024  
Time: 9:00 am  
Dept.: Courtroom 7, 19th Floor  
Judge: Hon. Maxine M. Chesney

1 I, Meredith R. Dearborn, declare as follows:

2 1. I am a partner with the law firm Paul, Weiss, Rifkind, Wharton & Garrison LLP,  
3 counsel of record for Defendants Coinbase Global, Inc. and Coinbase, Inc. (“Coinbase”) in this  
4 action. I make this declaration based on my own personal knowledge, and if called as a witness to  
5 testify, I could and would testify competently to the following facts.

6 2. I submit this declaration in support of Coinbase’s Motion to Stay Discovery Pending  
7 Resolution of Coinbase’s Motion to Dismiss and Motion to Strike Class Allegations.

8 3. Attached as **Exhibit A** is a true and correct copy of Plaintiff’s Requests for  
9 Production of Documents Set One to Defendants. Plaintiff emailed these document requests on  
10 May 3, 2024.

11 4. Attached as **Exhibit B** is a true and correct copy of Plaintiff’s Interrogatories to  
12 Defendant Coinbase Global, Inc., Set One. Plaintiff emailed these interrogatories on May 7, 2024.

13 5. Attached as **Exhibit C** is a true and correct copy of Plaintiff’s Interrogatories to  
14 Defendant Coinbase, Inc., Set One. Plaintiff emailed these interrogatories on May 7, 2024.

15 6. Defendants met and conferred with Plaintiff on the parties’ joint case management  
16 statement on May 8, 2024. During that conference, Coinbase informed Plaintiff that it would be  
17 filing its Motion to Dismiss Plaintiff’s Second Amended Complaint and Motion to Strike Class  
18 Allegations the next day, and asked whether Plaintiff would agree to hold their recently served  
19 discovery requests in abeyance until after the Motions were decided. Plaintiff did not agree, but  
20 requested that Coinbase propose a “middle ground” of some limited discovery to be conducted in  
21 the interim.

22 7. At Plaintiff’s request, on May 14, Coinbase proposed a compromise that would  
23 move some discovery tasks forward during the pendency of the Motion to Dismiss and Motion to  
24 Strike, including service of initial disclosures, the negotiation of a protective order, and production  
25 of certain categories of documents. Plaintiff did not agree. Plaintiff also did not propose a  
26 counteroffer, instead writing: “We will keep an eye out for your motion to stay.”  
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1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct and that this Declaration was executed on May 22nd, 2024, in San Francisco,  
3 California.

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5 /s/ Meredith R. Dearborn  
Meredith R. Dearborn  
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